



40 Broad Street, 7th Floor
New York, NY 10004
Telephone: (212) 943-9080

Adrianna R. Grancio
Partner
agrancio@vandallp.com

July 24, 2023

VIA ECF

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Trustees of the New York City District Council of Carpenters Pension Fund, et al., v. Statewide Restorations of New York, et al., 22 CV 1457 (JPC)***

Dear Judge Cronan:

This firm represent Plaintiffs in the above matter. Plaintiffs write, jointly with counsel for Defendants Statewide Restoration of New York Inc. (“Statewide Restoration”) and Statewide Construction Services of NY, Inc., (“Statewide Construction,” together with Statewide Restoration, the “Defendants”) to respectfully request a modification to the summary judgment briefing schedule (ECF. Doc. No. 42). The current deadlines and proposed new dates are as follows:

	Current Deadline	Proposed Deadline
Plaintiffs' Motion for Summary Judgment Due	July 30, 2023	August 29, 2023
Defendants' Opposition Due	August 27, 2023	September 26, 2023
Plaintiffs' Reply Due	September 10, 2023	October 10, 2023

As previously reported to the Court, the parties reached an agreement-in-principal which was circulated to the Plaintiffs Board of Trustees and approved. The parties are in the process of finalizing an agreement which memorializes the same. In light of the foregoing, the parties respectfully request a 30-day extension of the current briefing schedule deadlines to allow for finalization of settlement their settlement agreement and to avoid incurring the substantial and significant time and costs associated with motion practice. This is the parties’ second request for an extension of the summary judgment briefing deadlines. The first request was granted. No other deadlines will be affected should the instant request be granted.

We thank the Court for its time and attention to this matter.

Hon. John P. Cronan, U.S.D.J.
United States District Court, E.D.N.Y.
July 24, 2023

Respectfully submitted,

/s/ *Adrianna R. Grancio*

Adrianna R. Grancio, Esq.

/s/ *Craig Blanchard*

Craig Blanchard, Esq

The request is granted. By August 29, 2023 Plaintiffs shall file their motion for summary judgment; by September 26, 2023 Defendants shall file their opposition to that motion; and by October 10, 2023 Plaintiffs shall file their reply in support of that motion.

SO ORDERED.
Date: July 25, 2023
New York, New York



JOHN P. CRONAN
United States District Judge